

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

MARIA ALBANO, TERRENCE BOYD,
CLARINDA BYRD, TRAVIS CLEVINGER,
TAMMIE GREEN, MAYHUGH HORNE,
MELISSA JARAMILLO, KEITH JOHNSON,
DAVID KAPLAN, DANIEL KILGO, CURSILA
LONGORIA, LUIS RAMOS, ADRIEN
RODRIGUEZ, GILBERTO ROMAGNOLO,
BRENDA SHALEY, ROBERT SMITH, ROBERT
TAYLOR, individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,
and AMAZON ADVERTISING, LLC, a Delaware
limited liability company,

Defendants.

CASSAUNDRA MAXWELL, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

AMAZON.COM, INC., a Delaware corporation,
and AMAZON ADVERTISING, LLC, a Delaware
limited liability company,

Defendants.

No. 2:25-cv-00252-BJR

**STIPULATED MOTION TO
CONSOLIDATE AND EXTEND
DEADLINES AND ORDER**

No. 2:25-cv-00261-BJR

STIP. & ORDER TO SET
DEADLINES - 1
Case Nos. 2:25-cv-00252-BJR;
2:25-cv-00261-BJR

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1 Plaintiffs in the above captioned cases and Defendants Amazon.com, Inc. and Amazon
2 Advertising, LLC stipulate as follows:

3 1. On February 7, 2025, Plaintiffs Maria Albano, Terrence Boyd, Clarinda Byrd,
4 Travis Clevinger, Tammie Green, Mayhugh Horne, Melissa Jaramillo, Keith Johnson, David
5 Kaplan, Daniel Kilgo, Cursila Longoria, Luis Ramos, Adrien Rodriguez, Gilberto Romagnolo,
6 Brenda Shaley, Robert Smith, and Robert Taylor filed their complaint against Defendants. *Albano*
7 *v. Amazon.com, Inc.*, 2:25-cv-00252-BJR (W.D. Wash.), Dkt. No. 1. Days later, on February 10,
8 2025, Plaintiff Cassaundra Maxwell filed her complaint against the same two Defendants raising
9 similar allegations. *Maxwell v. Amazon.com, Inc.*, 2:25-cv-00261-BJR (W.D. Wash.), Dkt. No. 1.

10 2. The *Albano* and *Maxwell* actions (the “Related Cases”) have both been assigned to
11 The Honorable Barbara J. Rothstein.

12 3. On February 11, 2025, Plaintiff Maxwell filed a Notice of Related Cases identifying
13 the *Albano* action. *Maxwell*, 2:25-cv-00261-BJR (W.D. Wash.), Dkt. No. 4.

14 4. Plaintiffs in the Related Cases have held discussions regarding consolidation.

15 5. Consolidation of the Related Cases is appropriate because Plaintiffs agree that the
16 Related Cases are based on the same subject matter, arise from the same nucleus of operative facts,
17 assert similar causes of action, define similar and overlapping classes, allege similar wrongful
18 conduct, and seek similar remedies. Further, similar discovery and class certification issues will
19 be relevant to the Related Cases. As a result, consolidation will conserve judicial resources and
20 reduce the time and cost of trying the cases separately. *See, e.g., In re Valve Antitrust Litig.*, 2024
21 WL 5009034, at *1 (W.D. Wash. Dec. 6, 2024) (ruling that “given the sole defendant and
22 overlapping factual and legal issues, consolidation will promote judicial economy, ensure
23 consistent results, and streamline matters overall”); *Burton-Curl v. Seattle Coll. Dist. S. Campus*,
24 2023 WL 3004063, at *1 (W.D. Wash. Apr. 19, 2023) (“In determining whether consolidation is
25 warranted, courts evaluate the existence of common questions of law or fact and weigh the interests
26 of judicial economy against any delay or prejudice that might result.”). *See also Pierce v. Cnty. of*

1 *Orange*, 526 F.3d 1190, 1203 (9th Cir. 2008) (noting district courts' broad discretion to consolidate
2 actions).

3 6. Following consolidation, Plaintiffs' counsel in the Related Cases intend to file a
4 Consolidated Amended Complaint.

5 7. Accordingly, the Parties agree that rather than responding to each Complaint in the
6 Related Cases, Defendants should respond to the Consolidated Amended Complaint, once filed.
7 As a result, the Parties jointly move the Court for an Order as follows:

- 8 • The above captioned actions shall be consolidated as *In re Amazon Ads SDK*
9 *Litigation*, No. 2:25-cv-00252-BJR (W.D. Wash);
- 10 • Plaintiffs shall file a Consolidated Amended Complaint on or before June 30,
11 2025;
- 12 • Defendants will respond to the Consolidated Amended Complaint within 45 days
13 after the filing of the Consolidated Amended Complaint;
- 14 • If Defendants respond by way of motion to dismiss, Plaintiffs shall file an
15 opposition to the motion to dismiss within 45 days of the motion; Defendants
16 shall have 21 days to file a reply.

17 DATED: April 14, 2025

18 **COTCHETT, PITRE & MCCARTHY, LLP**

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STIP. & ORDER TO SET
DEADLINES - 3
Case Nos. 2:25-cv-00252-BJR;
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STIP. & ORDER TO SET
DEADLINES - 4

Case Nos. 2:25-cv-00252-BJR;
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STIP. & ORDER TO SET
DEADLINES - 5
Case Nos. 2:25-cv-00252-BJR;
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ORDER

Having reviewed the Parties' stipulation, and finding good cause exists for the requested relief, the Court hereby GRANTS the stipulation and establishes the following schedule:

1. The above captioned actions shall be consolidated as *In re Amazon Ads SDK Litigation*, No. 2:25-cv-00252-BJR (W.D. Wash);

2. Plaintiffs shall file a Consolidated Amended Complaint on or before June 30, 2025;

3. Defendants will respond to the Consolidated Amended Complaint within 45 days after the filing of the Consolidated Amended Complaint;

4. If Defendants respond by way of motion to dismiss, Plaintiffs shall file an opposition to the motion to dismiss within 45 days of the motion; Defendant shall have 21 days to file a reply.

The Clerk of the Court is hereby notified of this consolidation.

IT IS SO ORDERED.

DATED this 14th day of April, 2025.



THE HONORABLE BARBARA J. ROTHSTEIN
UNITED STATES DISTRICT COURT JUDGE

STIP. & ORDER TO SET
DEADLINES - 6
Case Nos. 2:25-cv-00252-BJR;
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